



James E. Johnson  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET, Rm. 3-193  
NEW YORK, NY 10007

ELISSA B. JACOBS  
Senior Corporation Counsel  
Phone: (212) 356-3540  
Fax: (212) 356-3559  
ejacobs@law.nyc.gov

## MEMO ENDORSED

May 24, 2020

**BY ECF**

Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Defendants' request for an extension of time is granted, and the proposed briefing schedule is approved. Defendants' moving papers are due July 12, 2021; Plaintiff's opposition August 9, 2021; and Defendants' reply August 23, 2021.

SO ORDERED.

Edgardo Ramos, U.S.D.J.  
Dated: 05/24/2021  
New York, New York

RE: Seth Curkin, et al. v. The City of New York, et al. 18 Civ. 7541 (ER) (SDA)

Your Honor:

I am a Senior Counsel in the Office of Corporation Counsel, and the supervisor of Maria DeCastro, who is assigned to the defense of the above-referenced matter. I write to respectfully request a 45 day extension of the deadlines for defendants to make their motion for summary judgment pursuant to F.R.C.P. 56, from Wednesday, May 26<sup>th</sup> until Monday, July 12<sup>th</sup>, as well as an extension of the related deadlines. Plaintiffs' counsel, P. Jenny Marashi, consents this request.

I am making this request as Ms. DeCastro, who has been handling this case and working on the motion papers, has unexpectedly had to take leave as of today and is unavailable to complete the papers. While the motion papers were in process, a new attorney will need time to learn the case and the documents as well as the legal arguments. Given the history of this case, I am requesting a forty-five day extension of all deadlines. The motion schedule would therefore be as follows:

Defendants' Moving Papers: July 12, 2021;  
Plaintiffs' opposition: August 9, 2021;  
Defendants' reply: August 23, 2021.

Thank you for your consideration of this request.

Sincerely Yours,

*Elissa B. Jacobs*

Elissa B. Jacobs  
Senior Counsel

**VIA ECF:**  
P. Jenny Marashi